



DEPARTMENT OF HEALTH
AND ENVIRONMENT

Kathleen Sebelius, Governor
Roderick L. Bremby, Secretary

www.kdheks.gov

April 2, 2009

Mr. George Jones
Robbie Manufacturing Inc.
10810 Mid-America Avenue
Lenexa, Kansas 66219



**Re: February 10-11, 2009 Compliance Inspection at Robbie Manufacturing, Inc.
Lenexa, Johnson County, EPA ID# KSD 054 080 148**

Dear Mr. Jones,

On February 10-11, 2009, a routine hazardous waste inspection was conducted at Robbie Manufacturing's Lenexa, Kansas to determine compliance with Kansas Administrative Regulations (KAR) and Kansas Statutes Annotated (KSA). This inspection was authorized under KAR 28-31-12. I am in receipt of the Company's March 31, 2009 response. As noted therein, the measures taken are sufficient to correct Violation 4.

In regard to Concern 2, upon further review of the findings of the inspection, it has been determined that the pre-centrifuge solvent saturated rags meet the definition of hazardous waste and must be managed as such. Thus, the following violation is hereby cited:

Violation 5 - Failure to mark each satellite accumulation container with the words "hazardous waste" per K.A.R. 28-31-4(j)(1)(B).

To correct this violation, Robbie Corporation must confirm that it has marked all satellite accumulation containers holding solvent saturated rag with the words "hazardous waste." The company must ensure that the containers are kept closed when not adding or removing wastes, and managed in accordance with the regulations.

In regard to Concern 3, additional information is required. By the compliance date below, Robbie Manufacturing must submit a statement describing the F&K (V8) press automatic clean up system. Specifically, please describe each of the tanks in this system, and how solvent is transferred to and between them.

Please also explain how waste solvent ends up in the waste tote, and at what frequency it is transferred, and from which tank. How does Robbie Manufacturing determine when to transfer waste solvent from the F&K system tank to the tote? Please also submit a diagram or schematics of the F&K press automatic clean up system.

No later than May 1, 2009, Robbie Manufacturing must provide a written response to this notice, including a description of corrective actions taken and the information requested.

This notice does not constitute a compliance order issued by KDHE and may not be a complete listing of all violations which may be identified as a result of this investigation.

Your cooperation with the waste management program is appreciated. If you have questions concerning this letter, please call me at (785) 842-4600.

Respectfully,



Laura D. Routh, CHMM
Waste Management Program, NE District Office
Bureau of Environmental Field Services

cc: Jim Rudeen, BWM
Rebecca Wenner, BWM
NEDO file